



**DLA Piper LLP (US)**  
1201 North Market Street, Suite 2100  
Wilmington, Delaware 19801-1147  
[www.dlapiper.com](http://www.dlapiper.com)

Denise S. Kraft  
[denise.kraft@dlapiper.com](mailto:denise.kraft@dlapiper.com)  
**T** 302.468.5645  
**F** 302.778.7917

December 17, 2015  
*VIA CM/ECF AND HAND DELIVERY*

The Honorable Christopher J. Burke  
J. Caleb Boggs Federal Building  
844 N. King Street  
Unit 28  
Room 2325  
Wilmington, DE 19801-3555

Re: *Toshiba Samsung Storage Technology Korea Corporation v. LG Electronics, Inc., et al*,  
C.A. No. 15-cv-00691-LPS-CJB

Dear Judge Burke:

Pursuant to the Court's Scheduling Order of December 7, 2015 (D.I. 33), please find enclosed herewith the parties' proposed Protective Order. Please note that the parties have been unable to reach agreement on all of the provisions of the Protective Order and thus show the differences in their respective proposals in bold in the attached draft.

We respectfully request a teleconference with the Court to finalize this matter.

Respectfully submitted,

**DLA Piper LLP (US)**

*/s/ Denise S. Kraft*

Denise S. Kraft  
Partner

DSK

WEST\266849045.1